



DEPARTMENT OF THE NAVY

NAVAL AIR STATION MEMPHIS  
MILLINGTON, TENNESSEE 38054 5000

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MILLINGTON SUPPACT  
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IN REPLY REFER TO

5090  
Ser 01010/002567  
25 JUN 1992

Mr. Jon D. Johnston  
Environmental Protection Agency  
Region IV  
Waste Management Division  
RCRA and Federal Facilities Branch  
345 Courtland Street  
Atlanta, Georgia 30365

38054.000  
19.41.00.0020

1D-00369

Subj: EPA ID #TN2170022600

Dear Mr. Johnston:

In accordance with our Draft Corrective Action Management Plan (CAMP) submitted December 19, 1991, the following response to your agency's Notice of Technical Inadequacy (NOTI) dated November 4, 1991, is provided. We agree with all general and specific comments, except for the comments cited below for which we propose a response for your consideration and concurrence:

Page 4, Comment 5

We recommend that well clusters be installed when the thickness of the aquifer warrants and field screening and/or groundwater sample analysis indicate that contaminants are present. This information will not be available until the first set of wells at a SWMU has been installed. Installing well clusters at predetermined locations without the benefit of field and/or laboratory data could result in an excess expenditure of time and money. The possible installation of well clusters during subsequent investigation phases will be discussed as suggested in Comment 23 on page 10.

Page 9, Comment 19

We believe that performing slug tests on all of the wells at a site would be excessive. Also, performing both slug tests and a short term pumping test at the same site is somewhat redundant. Short term pumping tests provide higher quality data than slug tests. To avoid excess expense, pump tests should not be conducted until a contamination problem has been identified. Therefore, we propose to conduct short term pump tests at SWMUs where groundwater contamination levels exceed ARARs.

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All information available from NAS Memphis indicates that waste was not stored inside Building N-126. Waste was stored on a paved area on the west side of the building in movable (wheeled) tanks called "bowzers." Because the bowzers were movable, it is not possible to define exactly where wastes were stored outside



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the building. No releases have been reported, therefore, no sampling was conducted at N-126. The use of bowzers for hazardous waste storage was discontinued so the wastes could be segregated in drums. The storage area for the drums was in the quonset hut area north of Building N-12. This area was sampled in April 1987 as part of the closure procedure for the facility. The analytical results were presented in the Draft RFI Work Plan as Attachment A. A map showing the sampling locations will be included in the revised work plan.

If you need any additional information or have any questions, please contact Mr. Mark Taylor of Southern Division, Naval Facilities Engineering Command at (803) 743-0573.

Sincerely,

P. M. MOTOLENICH  
CER. CEC, USN  
PUBLIC WORKS OFFICER  
BY DIRECTION OF THE COMMANDING OFFICER  
NAVAL AIR STATION MEMPHIS

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